

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

x

*In re Terrorist Attacks on September 11, 2001*

**03 MDL 1570 (RCC)**

x

This filing applies to:

*Ashton, et al. v. Al Qaeda Islamic Army, et al., Case No. 02-CV-6977*

*Estate of John P. O'Neill, Sr., et al. v. Al Baraka Investment and Development Corporation, et al., Case No. 04-CV-01923 (RCC)*

*Thomas E. Burnett, Sr., in his own right as the Father of Thomas E. Burnett, Jr., et al., v. Al Baraka Investment and Development Corporation, et al. Case No. 03-CV-5738*

**DECLARATION OF OMAR T. MOHAMMEDI**

**IN SUPPORT OF DEFENDANT WORLD ASSEMBLY OF MULIM YOUTH IN  
SAUDI ARABIA'S AND WORLD ASSEMBLY OF MUSLIM YOUTH  
INTERNATIONAL'S REPLY TO PERSONAL INJURY PLAINTIFFS'  
OPPOSITION TO MOTION TO DISMISS**

I am an attorney licensed to practice in the Southern District of New York. I am with the Law Firm of Omar T. Mohammedi, LLC, counsel to the World Assembly of Muslim Youth in Saudi Arabia ("WAMY SA") and the World Assembly of Muslim Youth International ("WAMY U.S.A"). I submit this declaration to transmit to the Court the following documents submitted in support of WAMY SA's and WAMY U.S.A.'s Reply to Personal Injury Plaintiffs' Opposition to their Motion to Dismiss the consolidated Personal Injury Complaints.

1. Exhibit A is a copy of the Notice of Service of Publication listing all Defendants served by publication in 2003.
2. Exhibit B is a copy of the Verification of Publication listing all Defendants served by publication in 2004-2005.

I declare under the penalties of perjury that the foregoing is true and correct to the best of my knowledge and belief.

/s/  
OMAR T. MOHAMMEDI

Dated: March 14, 2006

# EXHIBIT A

UNITED STATES DISTRICT COURT  
DISTRICT OF COLUMBIA

THOMAS BURNETT, SR., in his own  
right as the Father of THOMAS E.  
BURNETT, JR., Deceased, et al.,

Plaintiffs,

v.  
AL BARAKA INVESTMENT AND  
DEVELOPMENT CORPORATION, a/k/a  
AL BARAKA BANK a/k/a DALLAH  
ALBARAKA GROUP, LLC, et al.,

CIVIL ACTION  
CASE NUMBER 1-02-01616-JR

Defendants.

**NOTICE OF SERVICE BY PUBLICATION**

Come now the Plaintiffs, by counsel, and hereby provide this Court with notice of service of process by publication on certain Defendants. Plaintiffs inform the Court as follows:

1. On March 25, 2003, this Court approved service of Defendants located in the Middle East through service by publication. (See Docket No. 95). The Plaintiffs have now completed this service of process by publication, and file this pleading to serve as notice of same.
2. Pursuant to this Order, the following Defendants have been served by publication in the *International Herald Tribune* and *Al-Quds Al-Arabi* newspapers: ABDUL RAHMAN AL SWAILEM (D95), ABDULLAH BIN ABDUL MUHSEN AL TURKI (D158), ABDULLAH BIN SALEH AL OBAID (D23), ABDULLAH SULAIMAIN AL-RAJHI (D89), ABDULRAHMAN BIN KHALID BIN MAHFOUZ (D82), ADEL ABDUL BATTERJEE (D93), AHMED ALI JUMALE (D170), AL BARAKAAT EXCHANGE (D5), AL HARAMAIN FOUNDATION a/k/a AL HARAMAIN ISLAMIC FOUNDATION (D54), AQUEEL AL AQUEEL (D94), BAKR M. BIN LADEN (D180), DELTA OIL COMPANY (D101), HASSAN BAHFZALLAH (D24), KHALID SULAIMAIN AL-RAJHI (D90), KHALID SALIM BIN MAFOUZ a/k/a

SHEIK KHALID BIN MAFOUZ (D81), MOHAMMED JAMAL AL KHALIFA (D92), MUSLIM WORLD LEAGUE a/k/a RABITA AL-ALAM AL-ISLAMI a/k/a ISLAMIC WORLD LEAGUE (D21), NATIONAL COMMERCIAL BANK (D2), SHAHIR ABDULRAOOF BATTERJEE (D67), TADAMON ISLAMIC BANK (D8), TARIK BIN LADEN (D79), WA'EL HAMZA JALAITAN (D96), OMAR BIN LADEN (D181), OSAMA BIN LADEN (D78), SALEH ABDUL AZIZ AL RAJHI (D88), SAUDI BIN LADIN GROUP a/k/a BIN LADEN CORP. (D80), SULAMAIN BIN ABDUL AZIZ AL RAJHI (D87), YASSIN ABDULLAH AL KADI (D91), YOUSEF JAMEEL (D201), IBRAHIM MUHAMMAD AFANDI (D202), MOHAMMED BIN ABDULLAH AL-JOMAIH (D203), ABDULRAHMAN HASSAN SHARBATLY (D204), SALAHUDDIN ABDULJAWAD (D205), AHMAD AL HARBI (D207), MOHAMMED AL-ISSAI (D208), HAMAD HUSSAINI (D209), ABU RIDA AL SURI a/k/a MOHAMED LOAY BAYAZID (D210), SAUDI RED CRESCENT (D211), AHMED BRAHIM (D212), MOHAMMED ALI HASAN MOAYAD (D199), ABU MUSAB AL-ZARQAWI (D213), AYMAN AL-ZAWAHIRI (D214), ABU IBRAHIM AL-MASRI (D215), SULTAN AL-OUDA (D220), SAFAR AL-HAWALI (D221), SALEH AL-HUSSAYEN (D222), MUHAMMAD J. FAKIHI (D224), and FAISAL ISLAMIC BANK (D3).

3. The Legal Notice regarding the instant lawsuit appeared in the *International Herald Tribune* on May 23, 30 and June 6, 13, 20 and 27, 2003. An affidavit from the *International Herald Tribune* and copies of the Legal Notices are attached hereto as Exhibit A.

4. The Legal Notice regarding the instant case appeared in *Al-Quds Al-Arabi* on June 3, 11, 18 and 24 and July 12 and 14, 2003. A letter from *Al-Quds Al-Arabi* and copies of the Legal Notices are attached hereto as Exhibit B.

WHEREFORE, the Plaintiffs herein notify the Court and the parties of this completion of service by publication.

Dated: August 8, 2003

Respectfully Submitted:

/S/ Harry Huge

Harry Huge, Esq. (DC Bar No. 55640)  
HARRY HUGE LAW FIRM, LLP  
401 Ninth Street, N.W., Suite 450  
Washington, DC 20004  
Telephone: (202) 824-6046  
Facsimile: (202) 318-1261

# EXHIBIT B



7950 Jones Branch Drive • McLean, Virginia 22108  
(703) 854-3400

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### VERIFICATION OF PUBLICATION

#### COMMONWEALTH OF VIRGINIA COUNTY OF ARLINGTON

Being duly sworn Holly O'Hora says that she is the principal clerk of USA TODAY, and is duly authorized by USA TODAY to make this affidavit, and is fully acquainted with the facts stated herein: on Thursday, December 23, 2004, Thursday, December 30, 2004, Thursday, January 6, 2005 and Thursday, January 13, 2005 the following advertisement-  
LEGAL NOTICE: TO NAMED DEFENDANTS LISTED BELOW was published in  
**USA TODAY.**

A handwritten signature in black ink, appearing to read "Holly O'Hora".

Principal Clerk of USA TODAY  
January 13, 2005

Subscribed and sworn to before me  
This 14<sup>th</sup> day of January month  
2005 year.

Cheryl Rothlin  
Notary Public

My Commission Expires 3/31/2005

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THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK, CONSOLIDATED

or services by publication on September 15, 2004. It was Ordered that notice of the above-captioned action be published once a week for four consecutive weeks in English, in the *International Herald Tribune* and the USA Today, and in Arabic in at least one Arabic language newspaper circulated widely in the Middle East, as well as posting the relevant complaints on the website [www.uscourtserviceinternational.com](http://www.uscourtserviceinternational.com).



229 WEST 43RD STREET, NEW YORK, NY 10036, USA  
PHONE: (212) 556-7707 FAX: (212) 556-7706

## DECLARATION OF PUBLICATION

### NOTICE : of Filing of Complaints

The undersigned says:

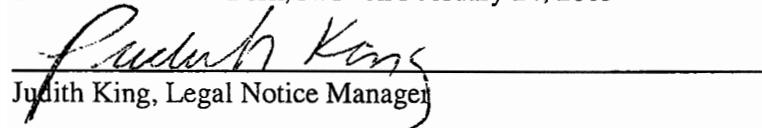
I am over the age of 18 years and a citizen of the United States.  
I am not a party to and have no interest in this matter. I am a principal  
of the International Herald Tribune, a newspaper published in Paris,  
France and circulated in major cities in Europe, North Africa, the Middle  
East. Far East and the Americas. The notice, a true copy of which is attached,  
was published on the following date(s):

December 22, 27, 2004

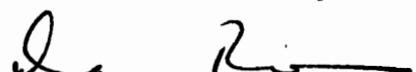
January 5, 10, 2005

I declare under penalty that the forgoing is true and correct.

Executed in New York, N.Y. on February 24, 2005

  
\_\_\_\_\_  
Judith King, Legal Notice Manager

Sworn before me on this 24<sup>th</sup> day of February 2005 in the state of New York.

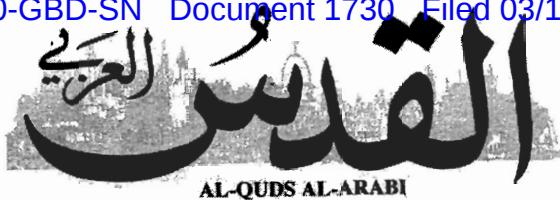
  
\_\_\_\_\_  
Notary Public

DANA ROSALES  
Notary Public, State of New York  
No. 01RO6059690  
Qualified in New York County  
Commission Expires August 29, 2007

Tribune

## **LEGAL NOTICE**

To named Defendants listed below:



**DECLARATION OF PUBLICATION**

**NOTICE : of Filing of Complaints**

The undersigned says:

I am the Business Manager and Company Secretary of Al-Quds Al-Arabi Publishing & Advertising (Overseas) Ltd and is duly authorized to make this affidavit.

The Notice , a true copy of which is attached , was published on the following dates : Thursday December 23<sup>rd</sup>, 2004, Thursday December 30<sup>th</sup> 2004, Thursday January 6<sup>th</sup> 2005 and Thursday January 13<sup>th</sup> 2005.

PAT SUNDARAM ( MRS )  
BUSINESS MANAGER  
MARCH 11<sup>TH</sup> 2005

SWORN BEFORE ME ON THIS 14<sup>th</sup> DAY OF March 2005

I THE UNDERSIGNED MANUEL FLOREZ VALCARCEL, Notary Public, practising at 130 King Street, London W6 0QU, England, hereby CERTIFY that the signature written at the end of the preceding document in my presence is the true and authentic signature, of Mrs. PATRICIA SUNDARAM, also known as PAT SUNDARAM as declared by her, of full age, who signed it in my presence having identified her by her British passport No. 094358024 valid until 23.04.2014 produced by her to me for her personal identification.

IN WITNESS WHEREOF I sign this Certificate in London, England, today the fourteenth day of March two thousand and five.

MANUEL FLOREZ VALCARCEL  
Notary Public

AL-QUDS AL-ARABI PUBLISHING & ADVERTISING (OVERSEAS) LIMITED

TEL: 0208-741 8008 • FAX: 0208-741- 8902 • 0208-748 7637 • E mail: alquds@alquds.co.uk • Website: www.alquds.co.uk

REGISTERED ADDRESS: 164-166 KING STREET • HAMMERSMITH • LONDON W6 0QU • REGISTERED NUMBER: 2604233• VAT REG NO: 538 9427 04

اعلان قانونی

**إلى المدعى عليهم المذكورين والمدرجة أسمائهم أدناه:**